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11 UBER TECHNOLOGIES, INC.,
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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16
17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
LITIGATION

19 This Document Relates to:

20 *Jane Roe CL 125 v. Uber Technologies,*
21 *Inc., et al., No. 3:25-cv-02233-CRB*

22 *Jane Roe CL 128 v. Uber Technologies,*
23 *Inc., et al., No. 3:25-cv-02497-CRB*

24 *L.L. (5) v. Uber Technologies, Inc., et al.,*
25 *No. 3:25-cv-03742-CRB*

26 *Roe CL 148 v. Uber Technologies, Inc., et*
27 *al., No. 3:25-cv-03812-CRB*

28 *Roe CL 147 v. Uber Technologies, Inc., et*
al., No. 3:25-cv-03811-CRB

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY REGARDING
PLAINTIFFS NOT IN COMPLIANCE
WITH THE COURT'S SEPTEMBER
8, 2025 ORDER [ECF 3861]**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

1 *Roe CL 149 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-03813-CRB*

3 *Roe CL 150 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-03815-CRB*

5 *Jane Roe CL 151 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv-03816-CRB*

7 *Jane Doe CL 156 v. Uber Technologies,*
8 *Inc., et al., No. 3:25-cv-03944-CRB*

9 *Jane Roe CL 158 v. Uber Technologies,*
10 *Inc., et al., No. 3:25-cv-04038-CRB*

11 *Jane Roe CL 160 v. Uber Technologies,*
12 *Inc., et al., No. 3:25-cv-04205-CRB*

13 *Jane Roe CL 161 v. Uber Technologies,*
14 *Inc., et al., No. 3:25-cv-04206-CRB*

15 *Jane Roe CL 163 v. Uber Technologies,*
16 *Inc., et al., No. 3:25-cv-04386-CRB*

17 *T.S. v. Uber Technologies, Inc.,*
18 *et al., No. 3:24-cv-00635-CRB*

19 *C.B. (2) v. Uber Technologies, Inc., et al.,*
20 *No. 3:25-cv-01961-CRB*

21 *Jane Doe LS 596 v. Uber Technologies,*
22 *Inc., et al., No. 3:25-cv-04069-CRB*

23 *Jane Doe LS 597 v. Uber Technologies,*
24 *Inc., et al., No. 3:25-cv-04070-CRB*

25 *Jane Doe LS 598 v. Uber Technologies,*
26 *Inc., et al., No. 3:25-cv-04071-CRB*

27 *Jane Roe Cl 165 v. Uber Technologies,*
28 *Inc., et al., No. 3:25-cv-04589-CRB*

Jane Roe Cl 166 v. Uber Technologies,
Inc., et al., No. 3:25-cv-04591-CRB

S.Y. v. Uber Technologies, Inc., et al., No.
3:25-cv-04629-CRB

Jane Doe LS 600 v. Uber Technologies,

1 *Inc., et al., No. 3:25-cv-04631-CRB*

2 *T.T. v. Uber Technologies, Inc., et al., No.*
3 *3:25-cv-04647-CRB*

4 *Jane Roe CL 167 v. Uber Technologies,*
5 *Inc., et al., No. 3:25-cv-04670-CRB*

6 *Jane Roe CL 169 v. Uber Technologies,*
7 *Inc., et al., No. 3:25-cv-04672-CRB*

8 *Jane Doe LS 601 v. Uber Technologies,*
9 *Inc., et al., No. 3:25-cv-04699-CRB*

10 *Jane Roe Cl 170 v. Uber Technologies,*
11 *Inc., et al., No. 3:25-cv-04705-CRB*

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, CA. I respectfully submit this declaration identifying the plaintiffs that are not in compliance with the Court's September 8, 2025 Order [ECF 3861].

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Uber"). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.

3. On September 8, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Cases for Failure to Comply with Court Order to provide a complete and verified Plaintiff Fact Sheet within 14 days of the Order. The Order therefore compelled compliance by each Plaintiff subject to the Order by September 22, 2025.

4. The Court also ordered counsel for Uber to submit a declaration within 21 days of the Order (*i.e.*, by September 29, 2025), identifying which, if any, Plaintiffs did not comply with the Court's Order.

5. On September 23, 2025, counsel for Uber reviewed MDL Centrality to determine which Plaintiffs subject to the Court's September 8, 2025, Order failed to provide a complete and verified Plaintiff Fact Sheet as ordered by the Court.

6. Based on counsel for Uber's review of MDL Centrality, as of September 23, 2025, the following Plaintiffs have failed to provide a Plaintiff Fact Sheet as ordered by the Court:

MDLC ID	Case Name	Case Number	Plaintiff Firm
1211	T.S.	3:24-cv-00635	Pro Se (formerly Clarkson Law Firm)
3268	Jane Roe CL 125	3:25-cv-02233	Cutter Law
3271	Jane Roe CL 128	3:25-cv-02497	Cutter Law
3379	Jane Doe LS 597	3:25-cv-04070	Levin Simes LLP

MDLC ID	Case Name	Case Number	Plaintiff Firm
3380	Jane Doe LS 598	3:25-cv-04071	Levin Simes LLP
3381	Jane Doe LS 596	3:25-cv-04069	Levin Simes LLP
3437	Jane Roe CL 147	3:25-cv-03811	Cutter Law
3438	Jane Roe CL 148	3:25-cv-03812	Cutter Law
3441	Jane Roe CL 151	3:25-cv-03816	Cutter Law
3446	Jane Doe CL 156	3:25-cv-03944	Cutter Law
3448	Jane Roe CL 158	3:25-cv-04038	Cutter Law
3450	Jane Roe CL 160	3:25-cv-04205	Cutter Law
3453	Jane Roe CL 163	3:25-cv-04386	Cutter Law
3482	T.T.	3:25-cv-04647	Wagstaff Law Firm
3512	Jane Doe LS 601	3:25-cv-04699	Levin Simes LLP
3545	Jane Roe CL 165	3:25-cv-04589	Cutter Law
3546	Jane Roe CL 166	3:25-cv-04591	Cutter Law
3550	Jane Roe CL 170	3:25-cv-04705	Cutter Law
3607	L.L.	3:25-cv-03742	Meyer Wilson; Peiffer Wolf
3912	C.B.	3:25-cv-01961	Pro Se (formerly Wagstaff Law Firm)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 23, 2025, in Los Angeles, California.

/s/Michael B. Shortnacy
Michael B. Shortnacy